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16 Attorneys for Defendant
17 DHL EXPRESS (USA), INC.

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19 UNITED STATES DISTRICT COURT
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21 NORTHERN DISTRICT OF CALIFORNIA
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23 SAN FRANCISCO DIVISION

24 FREDERICK SCHULZ, BRANDON WARREN
25 AND MATTHEW WARREN on behalf of himself
26 and all those similarly situated.,

27 Plaintiff,

28 v.

DHL EXPRESS (USA), INC., and Does 1-100,

Defendants.

Case No. 3:20-cv-04490-RS

**STIPULATION AND ORDER TO
CONTINUE HEARING ON ORDER TO
SHOW CAUSE REGARDING DISMISSAL**

[Removed from San Francisco County
Superior Court Case No. CGC-20-584120]

Date Action Filed: April 10, 2020

1 Plaintiffs FREDERICK SCHULZ, BRANDON WARREN and MATTHEW WARREN,
2 (“Plaintiffs”), individually and on behalf of others similarly situated, and Defendant DHL EXPRESS
3 (USA), INC. (“DHL”) (hereinafter collectively, “the Parties”), by and through their respective counsel,
4 hereby submit the following Stipulation to Continue the Hearing on the Order to Show Cause Regarding
5 Dismissal.

6 The Parties attended private mediation with Tripper Ortman on August 3, 2021. At the
7 mediation, the Parties reached a class-wide settlement. The Parties are finalizing the terms of the
8 settlement agreement. The Parties anticipate that Plaintiffs will file a Motion for Preliminary Settlement
9 Approval within 30 days.

10 The Parties request that the Hearing on the Order to Show Cause regarding Dismissal, currently
11 scheduled for October 28, 2021, be continued for 30 days while the Parties finalize the terms of the
12 settlement agreement.

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DATED: October 22, 2021

Respectfully submitted,
QUADRA & COLL, LLP

By: /s/ Rebecca M. Coll
James A. Quadra
Rebecca M. Coll
Niall Vignoles
Attorneys for Plaintiffs
FREDERICK SCHULZ, BRANDON
WARREN and MATTHEW WARREN

DATED: October 22, 2021

SEYFARTH SHAW LLP

By: /s/ Elizabeth J. MacGregor
Camille A. Olson
Richard B. Lapp
Chantelle C. Egan
Elizabeth J. MacGregor
Attorneys for Defendant
DHL EXPRESS (USA), INC.

Attestation Pursuant to Civil Local Rule 5-1(i)

Pursuant to Civil Local Rule 5-1(i), I, Elizabeth J. MacGregor, hereby attest that concurrence in the filing of this joint case management statement has been obtained from above signatory, James A. Quadra.

/s/ Elizabeth J. MacGregor
Elizabeth J. MacGregor

ORDER

The Court, having considered the Stipulation of the Parties to Continue the Hearing on the Order to Show Cause Regarding Dismissal, and good cause appearing, hereby:

1. Continues the hearing on the Order to Show Cause Regarding Dismissal to December 9, 2021. Show Cause Response due by December 2, 2021.

IT IS SO ORDERED.

DATE: October 22, 2021


Judge Richard Seeborg